#### **DUANE MORRIS LLP**

Gregory P. Gulia Vanessa C. Hew 1540 Broadway New York, New York 10036-4086

Tel.: (212) 692-1000 Fax: (212) 692-1020

Attorneys for Plaintiff Lagos Inc.

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

LAGOS INC.

Plaintiff,

-against-

LORRAINE E. SCHWARTZ, INC. and LORRAINE E. SCHWARTZ

Defendants.

Civil Action No. 1:07-CV-09 (LAP)

NOTICE OF MOTION FOR-ADMISSION PRO HAC VIÇE **OF** 

MAXIM A. VOLTCHENKO

PLEASE TAKE NOTICE that, upon the annexed Declaration of Gregory P. Gulia on October 19, 2007, plaintiff Lagos Inc. will move this Court before the Honorable Richard J. Sullivan, at the United States District Court, 500 Pearl Street, New York 10007, for an order pursuant to Local Civil Rule 1.3(c) granting the admission pro hac vice of

> Maxim A. Voltchenko Duane Morris LLP 30 South 17th Street Philadelphia, PA 19103-4196

Tel.: (215) 979-1000 Fax: (212) 979-1020

MAVoltchenko@duanemorris.com

to practice before this Court in the above captioned action. Maxim A. Voltchenko is a member in good standing of the Bar of the State of Pennsylvania. There are no pending disciplinary proceedings against Maxim A. Voltchenko in any State or Federal court.

Dated: New York, New York October 24, 2007

GREGORY P. GULIA

DUANE MORRIS LLP	
Gregory P. Gulia	
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1540 Broadway	
New York, New York 10036-4086	
Tel.: (212) 692-1000	
Fax: (212) 692-1020	
Attorneys for Plaintiff Lagos Inc.	
IN THE UNITED STATES DISTRICT COUFFOR THE SOUTHERN DISTRICT OF NEW	
	X
	:
LAGOS INC.	: Civil Action No. 1:07-CV-09254
	: (LAP)
Plaintiff,	:
. ,	: DECLADATION OF
-against-	: DECLARATION OF : GREGORY P. GULIA
	: GREGORY F. GULIA : IN SUPPORT OF MOTION
LORRAINE E. SCHWARTZ, INC. and	: FOR ADMISSION
LORRAINE E. SCHWARTZ	: PRO HAC VICE OF
	: MAXIM A. VOLTCHENKO

Defendants. : :------

STATE OF NEW YORK ) : ss.:

COUNTY OF NEW YORK )

GREGORY P. GULIA, under penalty of perjury, hereby declares:

1. I am a partner of the firm Duane Morris LLP, counsel for plaintiff Lagos Inc. in the above-captioned action. I am fully familiar with the facts contained herein. I submit this motion, pursuant to Local Civil Rule 1.3(c), for an order admitting *pro hac vice* Maxim A. Voltchenko to practice before this Court in the above-captioned action.

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2. I am a member in good standing of the bar of the State of New York and am

admitted to the bar of the United States District Court for the Southern District of New York. I

am in good standing with this court.

3. Maxim A. Voltchenko is a member in good standing of the State Bar of

Pennsylvania. An original Certificate of Good Standing issued by the State Bar of Pennsylvania

within the last thirty days is annexed as Exhibit A.

4. I have found Maxim A. Voltchenko to be a skilled attorney and a person of

integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil

Procedure.

5. I respectfully submit a proposed order granting the admission of Maxim A.

Voltchenko pro hac vice, annexed as Exhibit B.

WHEREFORE, it is respectfully requested that this Court admit pro hac vice

Maxim A. Voltchenko to practice before this Court in the above-captioned action.

I hereby declare under penalty of perjury under the laws of the United States of America

that the foregoing is true and correct.

Dated: New York, New York

October 24, 2007

GREGORY P. GULIA

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# Supreme Court of Pennsylvania

## **CERTIFICATE OF GOOD STANDING**

# Maxim Alexandrovich Voltchenko, Esq.

#### **DATE OF ADMISSION**

November 17, 2005

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal Dated: October 9, 2007

Patricia A. Johnson Chief Clerk

## **CERTIFICATE OF SERVICE**

This is to certify that I caused the foregoing Notice of Motion for Admission *Pro Hac Vice* of Maxim A. Voltchenko, Declaration of Gregory P. Gulia in Support of Motion for Admission *Pro Hac Vice* of Maxim A. Voltchenko, and Proposed Order for Admission *Pro Hac Vice* of Maxim A. Voltchenko to be served on the following individuals by first class mail:

Lorraine E. Schwartz 530 E 76th Street Apt. 20K New York, New York 10021

This the 24th day of October, 2007.

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### **CERTIFICATE OF SERVICE**

This is to certify that I caused the foregoing Notice of Motion for Admission *Pro Hac Vice* of Maxim A. Voltchenko, Declaration of Gregory P. Gulia in Support of Motion for Admission *Pro Hac Vice* of Maxim A. Voltchenko, and Proposed Order for Admission *Pro Hac Vice* of Maxim A. Voltchenko to be served on the following individuals by first class mail:

Lorraine E. Schwartz, Inc. 580 Fifth Avenue, Suite 1200 New York, New York 10036

This the 24th day of October, 2007.